

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

GLORIA TREVIÑO
Plaintiff

v.

**UNITED STATES DEPARTMENT OF
VETERAN AFFAIRS**
Defendant

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§
§
§

CIVIL ACTION NO.

COMPLAINT AND REQUEST FOR INJUNCTIVE RELIEF

Plaintiffs Gloria Treviño files this Complaint and Request for Injunctive Relief against the United States Department of Veterans Affairs.

I. PARTIES

1. Plaintiff is Gloria Treviño
2. Defendant is the United States Department of Veteran Affairs which is an agency of the United States. The matters complained of occurred at the Michael E. DeBakey V A Medical Center in Houston

3. II. VENUE

Venue is proper under 28 U.S. CODE § 402(b) because Treviño resides in Harris County Texas and the matters concerning the claims set forth occurred in Houston, Harris County Texas.

III. JURISDICTION

Jurisdiction is proper under 28 U.S.C. §1331 because this is a civil action which arises under 28 U.S.C. §1346 and 28 U.S.C. Part VI, Chapter 171.

IV. STATEMENT OF BASIC FACTS

1. Plaintiff Gloria Treviño (Treviño) is a 100% disabled veteran and suffers from chronic PTSD and other serious service-connected medical problems. Her Veteran's Administration Number is ***-**-6890.
2. Because of her many health problems, Treviño has received extensive treatment from the Michael E. DeBakey V A Medical Center in Houston, which is a facility for the Department of Veteran Affairs (the VA) for her condition. However, Trevino's treatment at the Houston VA has been medically inappropriate and completely unsatisfactory. Treviño and her counsel have made numerous attempts to resolve these issues, detailed below, and has requested without success and is requesting immediate help in requesting for payment to her medical providers outside of the Houston VA Facility as well as payment for her prescriptions rather than their being furnished through the VA Pharmacy.
3. Ms. Treviño has been diagnosed with both physical and psychological problems which require treatment. Her physical diagnosis includes back problems with two herniated discs on neck; degenerative spine disease, arthritis on whole back, Arthritis and Fibromyalgia. Because Treviño is a woman, she also needs regular mammograms and pap smears. For the past three months the Rose Clinic and the VA have not been able to schedule Trevino for her yearly mammogram even though the VA insisted it had approved the exam but Rose has denied this.
4. In addition, with respect to psychological issues, Treviño has been diagnosed with PTSD, Depression and Anxiety. However, VA physicians have tried to label her with Schizophrenia which is improper and stigmatizes her. In addition, Treviño has dental issues with a damaged jawbone and slight deformity of the face.

5. Trevino's efforts to get proper treatment for these medical issues have been unsuccessful.
6. The psychiatric treatment Treviño has received at the Houston VA facility has been a disaster. Dr. Jenny Hall who saw Treviño for five years until Ms. Treviño began to have problems with Karen Shaver, WVA Commander who falsely accused Ms. Treviño of stalking. Prior to this time, Dr. Hall would have personnel bring medications to Ms. Trevino's house. However, this was stopped when Ms. Treviño had the problems with Shaver. Dr. Hall also retaliated against Ms. Treviño when she accused Ms. Treviño of suing persons, although Ms. Trevino's lawsuits were entirely proper. Another time, when Ms. Treviño went to emergency room, Dr. Hall told emergency room doctor that "Treviño likes to sue and therefore alienated the staff so that Treviño did not get proper treatment. Finally, Ms. Treviño went to V.A. emergency room when she had a whiplash injury from an auto accident. The Doctor did x-rays; however, he put on down "slip and fall." This was not true and caused a problem with getting insurance coverage. Ms. Treviño had to go to the VA's Consumer Affairs Department because of this.
7. The next psychiatric therapist Ms. Treviño had problems with was Dr. Smith who took over from Dr. Hall. Treviño saw him about two years however, he threatened Treviño and apparently unjustly called the police on her. During this time Treviño received numerous harassing phone calls which apparently came from personnel related to the VA. Finally, Dr. Hall refused to order physical therapy for Treviño outside the hospital. The last psychiatric therapist Ms. Treviño saw was Dorothy Okoro who took over from Dr. Smith. Okoro was represented to be a psychiatrist but Ms. Treviño learned she was not. Okoro cancelled several of Trevino's appointments without justification and her treatment was

unsatisfactory.

8. The only psychiatrist who has helped Ms. Treviño is Doctor Karen S. Brown of Memorial Psychiatry who is not a VA physician. Ms. Treviño does not have the funds to continue to pay Doctor Brown and has repeatedly requested that the VA pay for these sessions without success. In addition, Dr. Brown has referred Ms. Treviño to Dr. Patricia Salvato to treat her for the diagnosed condition of fibromyalgia. Ms. Treviño has repeatedly requested that the VA pay for Dr. Salvato's services but the VA has improperly ignored these requests.
9. With respect to her regular physician care, Ms. Treviño has also received improper treatment. Her primary physician at the VA was Dr. Abbas. Dr. Abbas has made Treviño suffer every year when she was trying to have her mammogram. In addition, Dr. Abbas subjected her to great embarrassment and stress when he gave her a pap smear. With no medical reason there were about seven other persons in the room. One was a nurse and the others were office people. Ms. Treviño does not believe they were all medical. This was extremely embarrassing and done without any need to have all the persons looking on.
10. Ms. Treviño has also had issues with the dental care she has been given. Treviño has a damaged jawbone and a facial deformity. Trevino had difficulties in scheduling appoints. Treviño tried to schedule the appointments early, before noon, the earlier the better. They started making appoints in the afternoon in rush hour, like at 2 and 3. Treviño would reschedule in the morning and they would reschedule. They then stopped making appointment. The last time Treviño was there, they pulled a tooth and she now can constantly hear a noise.
11. In the past, Ms. Treviño has protested her treatment by the VA and has received harassing

treatment in return. Treviño made numerous complaints to the VA Director, Adam Walmus, VA Police and Consumer Affairs which were in vain. Ms Treviño was further retaliated against and abandoned by Dr. Jenny Hall and the ACT-TEAM, who had been providing her extensive medical care and medication and was dumped her as an outpatient to Dr. Smith. The VA continued to bother Ms. Treviño over her home and cell phones and refused to pay Emergency Room treatments at the West Houston Medical Center to interfere with her ability to seek emergency medical care elsewhere. Trevino's VA psychiatrist, Dr. Smith, was inappropriate in questioning her and may have called the police to go to her house. As a result, Ms. Treviño's physical medical problems have also been further aggravated and Treviño is in desperate need for emergency comprehensive top quality physical therapy. In addition the VAMC Director Adam Walmus has refused to give a letter to Trevino for an MRIS for Robert Trevino, Trevino's brother, whom Trevino has the power of attorney, and to agree to pay for Robert Trevino's medical care when he is released from Prison. Trevino was also treated improperly treated by Lt. Howard of the VA Police, the operators, and Ms. Ishmael. All the physicians and personnel identified above were, on information and belief, employees of the VA and were acting within the scope of their employment duties at the VA center in Houston..

12. On July 18, 2014, Treviño through her counsel, the undersigned, requested to the Houston VA, and particularly to Adam Walmus, VAMC Director at the Michael E. DeBakey VA Medical Center, to approve payment of outside medical vendors for Treviño as is provided for in 38 CFR 1756. A copy of this correspondence is attached as Exhibit 1. Rather than responding with a decision on the request, Walmus wrote requested that the undersigned

supply a medical release and also gave a name to address Treviño's issues with, Michele Farrow, Consumer Affairs Supervisor. A copy of the Walrus letter correspondence is attached as Exhibit 2. Treviño's counsel responded and provided the necessary information. A copy of this correspondence is attached as Exhibit 3. Despite this letter and several calls to Ms. Farrow, Treviño nor her counsel have been provided with any response or ruling on her request.

V. VIOLATION OF 28 U.S.C. §1346 and 28 U.S.C. PART VI, CHAPTER 171

13. The conduct complained of constitutes negligence under the laws of the State of Texas. In particular, the conduct complained above failed to meet the accepted standard of medical care which caused damages to Treviño and were a proximate cause of damages.

VI. 38 U.S.C. §1728 & 38 C.F.R. PART 1, CHAPTER 17

14. The VA is authorize to provide for the payment of outside medical vendors as set forth above and as provided for in 38 U.S.C. §1728 & 38 C.F.R. PART 1, CHAPTER 17.
15. The VA has failed in its duties to provide this for Treviño.

VIII. WAIVER OF REQUIREMENT OF EXHAUSTION OF ADMINISTRATIVE REMEDIES

16. As set forth above, the failure of the VA to dispose of the claim submitted on July 18, 2014 constitutes a waiver of the right of the VA to claim that Plaintiff did not exhaust administrative remedies. 28 U.S.C. §2627.

VIII. DAMAGES AND INJUNCTIVE RELIEF

17. Treviño seeks compensatory damages for her out of pocket medical expenses which the VA should have paid. In addition, Treviño seeks damages for emotional distress.

18. Treviño seeks injunctive relief requiring the VA to pay for her medical treatment with her private medical providers and in specific, Doctor Brown and Salvato as well as for her dental care and for her prescriptions other than from the VA.

IX. ATTORNEYS' FEES

Plaintiffs seek attorneys' fees and litigation costs. 28 U.S.C. §2678.

X. PRAYER

19. Award Treviño her compensatory damages and damages for medical relief;
20. Issue a mandatory injunction requiring the VA to pay for Treviño's medical costs for Dr. Brown, Dr. Salvato and for her dental care;
21. Award attorneys' fees, cost and post-judgment interest;
22. Grant all other and additional relief to which Plaintiff may be entitled, at law or in equity.

Respectfully submitted,

/s/ John E. Richards

John E. Richards
State Bar No. 16848900
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Dallas, Texas 75206
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ATTORNEYS FOR PLAINTIFF
Gloria Treviño

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July 18, 2014

via certified mail 7011 1570 0001 7703 7027

via regular mail

Acting Secretary Sloan D. Gibson
Department of Veteran Affairs
Washington DC VA Medical Center
50 Irving Street, NW
Washington, DC 20422

via certified mail 7011 1570 0001 77037003

via regular mail

Mr. Adam C. Walmus,
VAMC Director
Department of Veterans Affairs
Michael E. DeBakey V A Medical Center
2002 Holcombe Blvd.
Houston, TX 77030

**Re: Demand for Treatment Outside the Houston VA Center
Ms. Gloria Treviño
Veteran's Administration Number 466-96-6890**

**Demand for Action
Robert Rodriguez Treviño
VA number 450-86-7337**

Dear Sirs:

I represent Gloria Treviño as well as her brother Robert Treviño, for whom Ms. Treviño has a power to attorney to act in matters related to him.

I have previously sent the VA correspondence concerning both Ms. and Mr. Treviño, which I am attaching. However, there has not been any proper written response and my clients demand a response. Therefore, I am reasserting their complaints and demands as set forth below.

EXHIBIT 1

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Gloria Treviño

Ms. Treviño is a 100% disabled veteran and suffers from chronic PTSD and other serious service-connected medical problems. She has received extensive treatment from the Michael E. DeBakey V A Medical Center in Houston for her condition. However, her treatment at the Houston VA has been medically inappropriate and completely unsatisfactory. Obviously many veterans are experiencing issues related to care; however Ms. Treviño has had to deal with these issues for years. She is in need of immediate help, and is making this request for payment to her medical providers outside of the Houston VA Facility as well as payment for her prescriptions for Tamadol, Bupropion; Diclofenac and Ziprasidone rather than their being furnished through the VA Pharmacy.

Ms. Treviño has been diagnosed with both physical and psychological problems which require treatment. Her physical diagnosis includes back problems with two herniated discs on neck; degenerative spine disease, arthritis on whole back, Arthritis and Fibromyalgia. Because she is a woman, she also needs regular mammograms and pap smears. In addition, with respect to psychological issues, she has been diagnosed with PTSD, Depression and Anxiety. In addition, she has dental issues with a damaged jawbone and slight deformity of the face. This letter will detail some of the improper treatment she has received in these areas.

Of great concern of Ms. Treviño is the psychiatric treatment she has received at the Houston facility. It has been a great disaster. This began with Dr. Jenny Hall who saw her for five years until had Ms. Treviño began to have problems with Karen Shaver, WVA Commander who falsely accused Ms. Treviño of stalking. Prior to this time, Dr. Hall would have personnel bring medications to Ms. Treviño's house. However, this was stopped when Ms. Treviño had the problems with Shaver. Dr. Hall also retaliated against Ms. Treviño when she accused her of suing persons, although Ms. Treviño's lawsuits were entirely proper. Another time, when Ms. Treviño went to emergency room, Dr. Hall told emergency room doctor that "she likes to sue and she alienated the staff so that Gloria did not get proper treatment. Finally, Ms. Treviño went to V.A. the emergency room when she had a whiplash injury from an auto accident. The Doctor did x-rays; however, he put on down "slip and fall." This was not true and caused a problem with getting insurance coverage. Ms. Treviño had to go to consumer affairs because of this.

The next psychiatric therapist Ms. Treviño had problems with was Dr. Smith who took over from Dr. Hall. She saw him about two years however, he threatened her and apparently unjustly called the police on her. Also, during this time she received numerous harassing phone calls. The last psychiatric therapist Ms. Treviño saw was Dorothy Okoro who Took over from Dr. Smith. Okoro was represented to be a psychiatrist but Ms. Treviño learned she was not. Okoro cancelled several appointments and was totally unsatisfactory. As an example, when Ms. Treviño called the 800 number crisis hotline because she was in distress and depressed and in

Acting Secretary Sloan D. Gibson
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need of crisis help, Dr. Debra Lunden returned the call a couple of days later and chastised her over problems she had with them and told her that Dr. Okoro would be calling her to make an appointment. Dr. Okoro only made the appointment after one long month and then cancelled that one indefinitely. She would also discontinue badly needed medication. This is entirely improper.

The only psychiatrist who has helped Ms. Treviño is Doctor Karen S. Brown of Memorial Psychiatry, 820 Gessner Rd, Suite 750 ,Houston, TX 77024. Ms. Treviño does not have the funds to continue to pay Doctor Brown and is requesting that the VA pay for these sessions. In addition, Dr. Brown has referred Ms. Treviño to Dr. Patricia Salvato to treat her for the diagnosed condition of fibromyalgia. Ms. Treviño also is requesting that the VA pay for her services. Ms Treviño is also requesting that she be reimbursed for her medical expenses as well as for her future medical care by private medical providers.

With respect to her regular physician care, Ms. Treviño has also received improper treatment. Her primary physician at the VA was Dr. Ali Abbas. Dr. Abbas blatantly refused to order physical therapy outside the VAMC even though intensive physical therapy is not available at the VAMC and he unjustifiably discontinued her B12 injections in spite of the medical need for them and in spite of her objections as part of the harassment and retaliation. Dr. Abbas has also made her suffer every year when she was trying to have her mammograms.. He delayed them. She used to do at the Rose clinic outside of the VA and was supposed to do every year; however, Dr. Abbas gave her an inappropriate hard time in getting one. In addition, he subjected her to great embarrassment and stress when he gave her a pap smear. With no medical reason there were about seven other persons in the room. One was a nurse and the others were office people. Ms. Treviño does not believe they were all medical. This was extremely embarrassing and done without any need to have all the persons looking on.

Ms. Treviño has also had issues with the dental care she has been given. She has a damaged jawbone and a facial deformity. She had difficulties in scheduling appointments. She tried to schedule the appointments early, before noon, the earlier the better. They started making appointments in the afternoon in rush hour, like at 2 and 3. She would reschedule in the morning and they would reschedule. They then stopped making appointment. The last time she was there, they pulled a tooth and she now can constantly hear a noise when she moves her jaw.

Ms. Treviño has had the same issues with the VA eye clinic with respect to appointment problems.

In the past, Ms. Treviño has protested her treatment by the VA and has received harassing treatment in return. The psychiatrists, especially furnished by the VA have been completely inadequate. This includes Dr. Smith who was inappropriate when he called her. It is best that the outside vendors now treat Ms. Treviño. Ms. Treviño has been retaliated against by the DAV, VA, WVA and VAMC and others for her efforts to seek Justice for Robert Treviño

Acting Secretary Sloan D. Gibson
Adam C. Walmus
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and Family. As a result, she has also been betrayed and is the victim of egregious enterprise of relentless harassment and retaliation. Ms. Treviño has been slandered, threatened and kicked-out of the Women Veterans of America, (WVA) whose leader serves on the board and "supervises" all of the VA Medical Departments and doctors, including the Mental Health Department and Women's Clinic, and VA Volunteer Office where she was also removed. She made numerous complaints to the VA Director, Walmus, VA Police and Consumer Affairs which were in vain. Ms Treviño was further retaliated against and abandoned by Dr. Jenny Hall and the ACT-TEAM, who had been providing her extensive medical care and medication and was dumped her as an outpatient to Dr. Smith. She has been blacked-balled by the Houston VAMC executive and employees, including not only Mr. Walmus but also Bryan J. Dyck, the Voluntary Service Program Manager and WVA secretary Rebecca Johnson, who is also a VAMC employee and lives at the VAMC when she is not living with Mr. Dyck, who appears to be in a romantic relationship with her.

The VA continued to continued to bother Ms. Treviño over her home and cell phones and refused to pay Emergency Room treatments at the West Houston Medical Center to interfere with her ability to seek emergency medical care elsewhere. Most recently, as mentioned above, her VA psychiatrist, Dr. Smith, was inappropriate in questioning her and may have called the police to go to her house.

As a result of the aforementioned, Ms. Treviño's physical medical problems have also been further aggravated and she is in desperate need for emergency comprehensive top quality physical therapy at the Absolute Physical Therapy and Fitness at 2390 Dairy Ashford RD., Houston, Texas, telephone number (281)589-8877.

Robert Rodriguez Treviño

Robert R. Treviño is also 100 percent disabled highly decorated veteran from the Viet Nam war, remains unlawfully incarcerated by the Texas Department of Criminal Justice. I have much previous correspondence to the VA which is either unanswered or improperly answered. I have attached it. Mr. Treviño's medical conditions are detailed in these letters.

To date after two oppressive long years, the although the VA restored Mr. Treviño's Robert's 100% disability rating, it only did so after numerous demands and still the VA and Mr. Walmus have refused to supply a VAMC letter in support of Medical Recommended Intensive Supervision ("MRIS") for Mr. Treviño with the Texas Department of Criminal Justice. This would be presented to the Texas Board of Pardons and Parole, despite Mr. Treviño's dire critical health conditions and for humanitarian grounds. This further deprives him of the rights and benefits that he honorably earned on the battlefield and of his life and freedom.

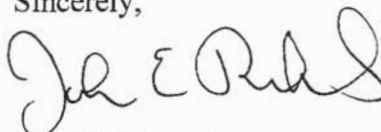
Consequently, Mr. Treviño and Ms. Treviño as his legal representative demand that the DAV, VA, VAMC, provide Mr. Treviño with a letter in support of MRIS. In addition, they

Acting Secretary Sloan D. Gibson
Adam C. Walms
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demand that VAMC provide a favorable letter stating it will pay Memorial Hermann Hospital on Southwest Freeway or any other private medical provider to treat Mr. Treviño for all the medical expenses and cost of taking care if Robert's medical upon his release from unlawful imprisonment to ensure Mr. Treviño gets the top quality medical care that he is legally and morally entitled

I look forward to your prompt response to provide me with whatever additional information you require on this request. This is an urgent request. Previous requests have been ignored and this cannot continue.

Sincerely,

A handwritten signature in black ink, appearing to read "John E. Richards".

John E. Richards
Attorney for Gloria Treviño and
Robert Rodriguez Treviño

cc: Gloria Treviño
E. Dufrene via certified mail 7011 2970 0003 8396 5407
Veteran Service Manager
Regional Office of Veterans Affairs
Department of Veteran Affairs
6900 Alameda Rd
Houston, TX 77030

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March 15, 2013

VIA HAND DELIVERY

Bryant T. Bayley, MHA, FACHE
Acting Medical Central Director
Department of Veterans Affairs
Michael E. DeBakey V A Medical Center
2002 Holcombe Blvd.
Houston, TX 77030

E. Dufrene
Veteran Service Manager
Regional Office of Veterans Affairs
Department of Veteran Affairs
6900 Almeda Rd
Houston, TX 77030

CONSUMER AFFAIRS, ATTN: Lupe
Michael E. DeBakey V A Medical Center
2002 Holcombe Blvd.
Houston, TX 77030

Re: Robert Rodriguez Treviño
VA number 450-86-7337

Dear Sirs:

I represent Robert R. Treviño.

As you are aware both from my previous correspondence as well as from Mr. Trevino's sister, Gloria Treviño, Robert R. Treviño, who is a decorated veteran from the Viet Nam war, remains unlawfully incarcerated at the TDCJ, Jester VI Psychiatric Unit. My previous correspondence dated January 19, 2013, which is attached, remains unanswered by the VA and all the issues and questions raised in that letter need also to be answered..

Mr. Treviño recently suffered a massive heart-attack and his condition is critical and life-threatening. Robert's medical problems are all service-connected. His disability rating is presently about 200% since his previous 100% disability rating for PTSD and for his other traumatic war injuries were improperly and in violation of regulations, reduced to 80% and have since doubled. In 1995, the Ellis County Judicial Offenders and Dallas, Texas VA improperly denied Robert a competency examination. He was illegally persecuted, railroaded and condemned to life-imprisonment after being falsely accused of being a "pedophile." To date, the VA has improperly refused to restore Robert's previous 100% disability rating even though his service-connected medical condition is critical

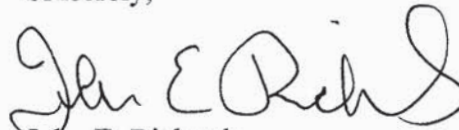
EXHIBIT 1

previous 100% disability rating even though his service-connected medical condition is critical and life-threatening or to even provide Mr. Treviño or his sister Gloria, who has his power of attorney with a letter from the VAMC to facilitate the efforts to get Mr. Treviño out on an Emergency Medical Reprieve to present to the Texas Board of Pardons and Parole, despite humanitarian grounds. This further deprives him of the rights and benefits that he honorably earned on the battlefield and of his life and freedom.

Consequently, Mr. Treviño and Ms. Treviño, as his legal representative demand that the DAV, VA, VAMC, reinstate Mr. Treviño to 100% disability rating and to provide a favorable letter addressed to the Memorial City Hospital in Houston which states the VA will pay Memorial City Hospital for all the costs and expenses for the emergency hospitalization and for all other medical treatment of Mr. Treviño upon his release from unlawful imprisonment on Emergency Medical Reprieve to ensure Mr. Treviño 's gets top quality medical care

I look forward to your prompt response to provide me with whatever additional information you require on this request. This is an urgent request. Previous requests have been ignored and this cannot continue. I would request an acknowledgement of receipt of this letter within ten days.

Sincerely,

A handwritten signature in black ink, appearing to read "John E. Richards". The signature is fluid and cursive, with the first name "John" being particularly prominent.

John E. Richards

Attorney for Robert R. Treviño

cc: Gloria Treviño
DAV, c/o J Aaron DeLaughter

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ATTORNEYS AND COUNSELORS

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March 15, 2013

VIA HAND DELIVERY

Mr. Adam Walumus,
VAMC Director
Department of Veterans Affairs
Michael E. DeBakey V A Medical Center
2002 Holcombe Blvd.
Houston, TX 77030

E. Dufrene
Veteran Service Manager
Regional Office of Veterans Affairs
Department of Veteran Affairs
6900 Almeda Rd
Houston, TX 77030

Consumer Affairs, c/o Lupe
Michael E. DeBakey V A Medical Center
2002 Holcombe Blvd.
Houston, TX 77030

**Re: Ms. Gloria Treviño
Veteran's Administration Number 466-96-6890**

Dear Sirs:

I represent Gloria Treviño.

Ms. Treviño is a 100% disabled veteran and suffers from chronic PTSD and other serious service-connected medical problems as a result of MST. She has received extensive treatment from the V A Medical Center in Houston for this condition. However, her treatment at the VA has been completely unsatisfactory. The only psychiatrist who has helped her is Doctor Karen S. Brown of Memorial Psychiatry, 820 Gessner Rd, Suite 750, Houston, TX 77024. Ms. Treviño does not have the funds to continue to pay Doctor Brown and is requesting that the VA pay for these sessions. In addition, Dr. Brown has referred Ms. Treviño to Dr. Patricia Salvato to treat her for the diagnosed condition of fibromyalgia. Ms. Treviño also is requesting that the VA pay for her services. Ms. Treviño is also requesting that she be reimbursed for her medical expenses as well as for her future medical care by private medical providers.

In the past, Ms. Treviño has protested her treatment by the VA and has received harassing treatment in return. The psychiatrists, especially furnished by the VA have been completely inadequate. This includes Dr. Smith who was inappropriate when he called her. It is best that the outside vendors now treat Ms. Treviño. Ms. Treviño has also been retaliated against by the DAV, VA, WVA and VAMC and others for her efforts to seek Justice for Robert Trevino and

EXHIBIT 1

Family. As a result, she has also been betrayed and is the victim of egregious enterprise of relentless harassment and retaliation. In addition, Ms. Treviño has been slandered, threatened and kicked-out of the Women Veterans of America, (WVA) whose leader serves on the board and "supervises" all of the VA Medical Departments and doctors, including the Mental Health Department and Women's Clinic, and VA Volunteer Office where she was also removed. She made numerous complaints to the VA Director, Adam Walms, VA Police and Consumer Affairs which were in vain. Ms Treviño was further retaliated against and abandoned by Dr. Jenny Hall and the ACT-TEAM, who had been providing her extensive medical care and medication and was dumped her as an outpatient to Dr. Smith. The VA continued to continued to bother Ms. Treviño over her home and cell phones and refused to pay Emergency Room treatments at the West Houston Medical Center to interfere with her ability to seek emergency medical care elsewhere. Most recently, as mentioned above, her VA psychiatrist, Dr. Smith, was inappropriate in questioning her and may have called the police to go to her house. As a result, Ms. Treviño's physical medical problems have also been further aggravated and she is in desperate need for emergency comprehensive top quality physical therapy at the Absolute Physical Therapy and Fitness at 2390 Dairy Ashford RD., Houston, Texas, telephone number, (281)589-8877. She is also in emergency need for additional funds to pay for permanent aid and assistance in caring for herself and for the up-keep of her home.

In addition, Ms. Treviño and has been prescribed Cymbalta, Bupropion, Thamadol, Lyrica, vitamins and supplements for her condition and she requests that the VA pay for these medications rather than furnishing it through the VA pharmacy.

I look forward to your prompt response to provide me with whatever additional information you require on this request. This is an urgent request. Previous requests have been ignored and this cannot continue.

Sincerely,



John E. Richards

cc: Gloria Treviño
J Aaron DeLaughter



DEPARTMENT OF VETERANS AFFAIRS
Michael E. DeBakey VA Medical Center
2002 Holcombe Boulevard
Houston TX 77030

In Reply Refer To:

580/11D

• AUG 14 2014

John E. Richards
6060 North Central Expressway
Suite 560
Dallas, Texas 75206

Dear Mr. Richards:

This letter is in response to your correspondence dated July 18, 2014, regarding your "demand for treatment outside the Houston VA Center for Ms. Gloria Trevino, and demand for action for Mr. Robert Rodriguez Trevino." The Michael E. DeBakey VA Medical Center (MEDVAMC) has communicated to the Trevino family regarding these issues on a number of occasions to include: August 21, 2012, December 20, 2013, and March 7, 2014.

As has been discussed before, Mr. Trevino is not currently eligible for care while being incarcerated. Current regulations restrict the VA from providing hospital and outpatient care to an incarcerated Veteran who is an inmate in an institution of another government agency when that agency has a duty to give the care or services. The MEDVAMC may provide care once Mr. Trevino has been unconditionally released from the penal institution, and Mr. Trevino should contact the nearest VA health care facility upon his release.

In terms of Ms. Trevino's care, we cannot respond directly to you without your submission of an authorization signed by Ms. Trevino allowing us to disclose private health information. We would be glad to go into further detail, if and when you submit the appropriate release of information.

Thank you for allowing us the opportunity to address some of your concerns. If you have any further concerns, please contact Ms. Michele Farrow, Consumer Affairs Supervisor at 713-794-7884.

Sincerely,

A handwritten signature in black ink, appearing to read "Adam C. Walms", is written above the printed name.

Adam C. Walms, MHA, FACHE
Medical Center Director

ACW/smr

RICHARDS & VALDEZ

ATTORNEYS AND COUNSELORS

JOHN E. RICHARDS
Rated AV Preeminent™ by Martindale-Hubbell
Board Certified - Labor and Employment Law
Board Certified - Civil Trial Law
Texas Board of Legal Specialization
john.richards@richardsvaldez.com

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DALLAS, TEXAS 75206
Telephone (214) 455-4690
Telecopier (866) 823-2719

October 2, 2014

via certified mail #7007 1490 0004 8347 2309

Mr. Adam Walms, MHA, FACHE,
VAMC Director
Department of Veterans Affairs
Michael E. DeBakey V A Medical Center
2002 Holcombe Blvd.
Houston, TX 77030

via facsimile at 713-794-7728

Ms. Michele Farrow
Consumer Affairs Supervisor
Department of Veterans Affairs
Michael E. DeBakey V A Medical Center
2002 Holcombe Blvd.
Houston, TX 77030

**Re: Demand for Treatment Outside the Houston VA Center
Ms. Gloria Treviño
Veteran's Administration Number 466-96-6890**

Dear Mr. Walms and Ms. Farrow:

In response to your letter dated 8-14-14, I am attaching the release from Ms. Treviño authorizing you to deal with me as her representative.

A I mentioned in my earlier letter, which I am also attaching numerous concerns related to Ms. Treviño. I will not repeat the matters set forth in that earlier letter other than to reiterate that Ms. Treviño is a 100% disabled veteran and suffers from chronic PTSD and other serious service-connected medical problems. She has received extensive treatment from the V A Medical Center in Houston for her condition. However, her treatment at the Houston VA has been medically inappropriate and completely unsatisfactory. Obviously many veterans are experiencing issues related to care; however Ms. Treviño has had to deal with these issues for years. She is in need of

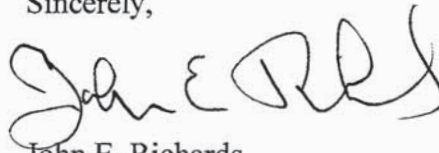
EXHIBIT 3

Adam Walms
October 2, 2014
Page 2

immediate help, and is making this request for payment to her medical providers outside of the Houtson VA Facility as well as payment for her prescriptions and for dental service.

I look forward to your prompt response to provide me with whatever additional information you require on this request. This is an urgent request. Previous requests have been ignored and this cannot continue.

Sincerely,



John E. Richards

cc: Gloria Treviño

RELEASE, INCLUDING HIPAA RELEASE AND AUTHORIZATION

I, Gloria Trevino, Principal, Veteran's Administration Number 466-96-689, hereby authorize the following person to act as my agent with regard to the matters specified in this Release related to my records at the United States Department of Veteran Affairs:

Name: John E. Richards of Richards & Valdez
Address: 6060 North Central Expressway, Suite 560, Dallas, TX 75206
Phone, Fax and Email: Phone: 214-455-4690; Fax: 866-823-2719; Email: john.richards@richardsvaldez.com

This Release and all of the provisions contained herein are effective immediately. I intend for my agent to be treated as I would be treated with respect to my rights regarding the use and disclosure of my information at the Department of Veterans Affairs, including individually identifiable health information and other medical records. This Release authority applies to any information governed by the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"), 42 USC 1320d and 45 CFR 160-164 or any privacy statute covering the Department of Veterans Affairs.

AUTHORIZATION

I hereby authorize the United States Department of Veterans Affairs, including its employees as well any doctor, physician, medical specialist, psychiatrist, chiropractor, health-care professional, dentist, optometrist, health plan, hospital, hospice, clinic, laboratory, pharmacy or pharmacy benefit manager, medical facility, pathologist, or other provider of medical or mental health care, as well as any insurance company and the Medical Information Bureau Inc. or other health-care clearinghouse that has paid for or is seeking payment from me for such services (referred to herein as a "covered entity") that are associated with the Department of Veteran Affairs to give, disclose and release to my agent who is named herein and who is currently serving as such, without restriction, all of my information held at the Department of Veterans Affairs, including individually identifiable health information and medical records regarding any past, present or future medical or mental health condition, including all information relating to the diagnosis and treatment of HIV/AIDS, sexually transmitted diseases, mental illness, and drug or alcohol abuse. Additionally, this disclosure shall include the ability to ask questions and discuss this protected information, including medical information with the person or entity who has possession of the protected medical information even if I am fully competent to ask questions and discuss this matter at the time. It is my intention to give a full authorization to any information including protected medical information to my agent.

In determining whether I am incapacitated, all individually identifiable health information and medical records at the Department of Veteran Affairs shall be released to my agent, including any written opinion relating to my incapacity that my agent may have requested. This release authority applies to any information governed by HIPAA and applies even if my agent has not yet begun serving as my agent.

The authority given to my agent shall supersede any prior agreement that I may have made with my health-care providers to restrict access to or disclosure of my individually identifiable health information. The individually identifiable health information and other medical records given, disclosed, or released to my agent may be subject to

redisclosure by my agent and may no longer be protected by HIPAA.

TERMINATION

This Release shall terminate on the first to occur of: (1) two years following my death, or (2) upon my written revocation actually received by the covered entity. Proof of receipt of my written revocation may be by certified mail, registered mail, facsimile, electronic mail, or any other receipt evidencing actual receipt by the covered entity. This Release shall not be affected by my subsequent disability or incapacity. There are no exceptions to my right to revoke this Release.

RELEASE

Each covered entity that acts in reliance on this Release shall be released from liability which may result from disclosing my individually identifiable health information and other medical records.

LEGAL ACTION

I authorize my agent to bring a legal action against a covered entity which refuses to accept and recognize this Release. Further, in order to fulfill my intent as expressed herein, I authorize my agent to sign any documentation that my agent deems necessary or appropriate in order to secure the disclosure of my individually identifiable health information and other medical records.

SUBSEQUENT DISCLOSURE OF INFORMATION

Any information disclosed to my agent pursuant to this Release may subsequently be disclosed to another party by my agent. My agent shall not be required to indemnify a covered entity or perform any act in the event information is subsequently disclosed by my agent.

COPIES AND FACSIMILES

Copies or facsimiles of this Release shall be as valid as the original Release.

I sign my name to this Release on the 17th day of September, 2014.



Gloria Trevino, Principal
12526 Olympia Drive
Houston, Texas 77077
Phone: (713) 309-5962
Email: vip4justice@gmail.com

SIGNATURE OF FIRST WITNESS

Witness Signature:



Print Name:

JOSE M. BERCIAN

Address:

12121 Westheimer Rd Houston, TX 77077

Date:

9-19-2014, 2008

SIGNATURE OF SECOND WITNESS

Witness Signature:



Print Name:

BILAL WARSI

Address:

12121 Westheimer Rd, Houston, TX, 77077

Date:

09/19/2014, 2008

RICHARDS & VALDEZ

ATTORNEYS AND COUNSELORS

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Board Certified - Labor and Employment Law
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July 18, 2014

via certified mail 7011 1570 0001 7703 7027
via regular mail

Acting Secretary Sloan D. Gibson
Department of Veteran Affairs
Washington DC VA Medical Center
50 Irving Street, NW
Washington, DC 20422

via certified mail 7011 1570 0001 77037003
via regular mail

Mr. Adam C. Walmus,
VAMC Director
Department of Veterans Affairs
Michael E. DeBakey V A Medical Center
2002 Holcombe Blvd.
Houston, TX 77030

**Re: Demand for Treatment Outside the Houston VA Center
Ms. Gloria Treviño
Veteran's Administration Number 466-96-6890**

**Demand for Action
Robert Rodriguez Treviño
VA number 450-86-7337**

Dear Sirs:

I represent Gloria Treviño as well as her brother Robert Treviño, for whom Ms. Treviño has a power to attorney to act in matters related to him.

I have previously sent the VA correspondence concerning both Ms. and Mr. Treviño, which I am attaching. However, there has not been any proper written response and my clients demand a response. Therefore, I am reasserting their complaints and demands as set forth below.

Acting Secretary Sloan D. Gibson
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Gloria Treviño

Ms. Treviño is a 100% disabled veteran and suffers from chronic PTSD and other serious service-connected medical problems. She has received extensive treatment from the Michael E. DeBakey V A Medical Center in Houston for her condition. However, her treatment at the Houston VA has been medically inappropriate and completely unsatisfactory. Obviously many veterans are experiencing issues related to care; however Ms. Treviño has had to deal with these issues for years. She is in need of immediate help, and is making this request for payment to her medical providers outside of the Houston VA Facility as well as payment for her prescriptions for Tamadol, Bupropion; Diclofenac and Ziprasidone rather than their being furnished through the VA Pharmacy.

Ms. Treviño has been diagnosed with both physical and psychological problems which require treatment. Her physical diagnosis includes back problems with two herniated discs on neck; degenerative spine disease, arthritis on whole back, Arthritis and Fibromyalgia. Because she is a woman, she also needs regular mammograms and pap smears. In addition, with respect to psychological issues, she has been diagnosed with PTSD, Depression and Anxiety. In addition, she has dental issues with a damaged jawbone and slight deformity of the face. This letter will detail some of the improper treatment she has received in these areas.

Of great concern of Ms. Treviño is the psychiatric treatment she has received at the Houston facility. It has been a great disaster. This began with Dr. Jenny Hall who saw her for five years until had Ms. Treviño began to have problems with Karen Shaver, WVA Commander who falsely accused Ms. Treviño of stalking. Prior to this time, Dr. Hall would have personnel bring medications to Ms. Treviño's house. However, this was stopped when Ms. Treviño had the problems with Shaver. Dr. Hall also retaliated against Ms. Treviño when she accused her of suing persons, although Ms. Treviño's lawsuits were entirely proper. Another time, when Ms. Treviño went to emergency room, Dr. Hall told emergency room doctor that "she likes to sue and she alienated the staff so that Gloria did not get proper treatment. Finally, Ms. Treviño went to V.A. the emergency room when she had a whiplash injury from an auto accident. The Doctor did x-rays; however, he put on down "slip and fall." This was not true and caused a problem with getting insurance coverage. Ms. Treviño had to go to consumer affairs because of this.

The next psychiatric therapist Ms. Treviño had problems with was Dr. Smith who took over from Dr. Hall. She saw him about two years however, he threatened her and apparently unjustly called the police on her. Also, during this time she received numerous harassing phone calls. The last psychiatric therapist Ms. Treviño saw was Dorothy Okoro who Took over from Dr. Smith. Okoro was represented to be a psychiatrist but Ms. Treviño learned she was not. Okoro cancelled several appointments and was totally unsatisfactory. As an example, when Ms. Treviño called the 800 number crisis hotline because she was in distress and depressed and in

Acting Secretary Sloan D. Gibson
Adam C. Walms
July 19, 2014
Page 3

need of crisis help, Dr. Debra Lunden returned the call a couple of days later and chastised her over problems she had with them and told her that Dr. Okoro would be calling her to make an appointment. Dr. Okoro only made the appointment after one long month and then cancelled that one indefinitely. She would also discontinue badly needed medication. This is entirely improper.

The only psychiatrist who has helped Ms. Treviño is Doctor Karen S. Brown of Memorial Psychiatry, 820 Gessner Rd, Suite 750 ,Houston, TX 77024. Ms. Treviño does not have the funds to continue to pay Doctor Brown and is requesting that the VA pay for these sessions. In addition, Dr. Brown has referred Ms. Treviño to Dr. Patricia Salvato to treat her for the diagnosed condition of fibromyalgia. Ms. Treviño also is requesting that the VA pay for her services. Ms Treviño is also requesting that she be reimbursed for her medical expenses as well as for her future medical care by private medical providers.

With respect to her regular physician care, Ms. Treviño has also received improper treatment. Her primary physician at the VA was Dr. Ali Abbas. Dr. Abbas blatantly refused to order physical therapy outside the VAMC even though intensive physical therapy is not available at the VAMC and he unjustifiably discontinued her B12 injections in spite of the medical need for them and in spite of her objections as part of the harassment and retaliation. Dr. Abbas has also made her suffer every year when she was trying to have her mammograms.. He delayed them. She used to do at the Rose clinic outside of the VA and was supposed to do every year; however, Dr. Abbas gave her an inappropriate hard time in getting one. In addition, he subjected her to great embarrassment and stress when he gave her a pap smear. With no medical reason there were about seven other persons in the room. One was a nurse and the others were office people. Ms. Treviño does not believe they were all medical. This was extremely embarrassing and done without any need to have all the persons looking on.

Ms. Treviño has also had issues with the dental care she has been given. She has a damaged jawbone and a facial deformity. She had difficulties in scheduling appointments. She tried to schedule the appointments early, before noon, the earlier the better. They started making appointments in the afternoon in rush hour, like at 2 and 3. She would reschedule in the morning and they would reschedule. They then stopped making appointment. The last time she was there, they pulled a tooth and she now can constantly hear a noise when she moves her jaw.

Ms. Treviño has had the same issues with the VA eye clinic with respect to appointment problems.

In the past, Ms. Treviño has protested her treatment by the VA and has received harassing treatment in return. The psychiatrists, especially furnished by the VA have been completely inadequate. This includes Dr. Smith who was inappropriate when he called her. It is best that the outside vendors now treat Ms. Treviño. Ms. Treviño has been retaliated against by the DAV, VA, WVA and VAMC and others for her efforts to seek Justice for Robert Treviño

Acting Secretary Sloan D. Gibson
Adam C. Walmus
July 19, 2014
Page 4

and Family. As a result, she has also been betrayed and is the victim of egregious enterprise of relentless harassment and retaliation. Ms. Treviño has been slandered, threatened and kicked-out of the Women Veterans of America, (WVA) whose leader serves on the board and "supervises" all of the VA Medical Departments and doctors, including the Mental Health Department and Women's Clinic, and VA Volunteer Office where she was also removed. She made numerous complaints to the VA Director, Walmus, VA Police and Consumer Affairs which were in vain. Ms Treviño was further retaliated against and abandoned by Dr. Jenny Hall and the ACT-TEAM, who had been providing her extensive medical care and medication and was dumped her as an outpatient to Dr. Smith. She has been blacked-balled by the Houston VAMC executive and employees, including not only Mr. Walmus but also Bryan J. Dyck, the Voluntary Service Program Manager and WVA secretary Rebecca Johnson, who is also a VAMC employee and lives at the VAMC when she is not living with Mr. Dyck, who appears to be in a romantic relationship with her.

The VA continued to continued to bother Ms. Treviño over her home and cell phones and refused to pay Emergency Room treatments at the West Houston Medical Center to interfere with her ability to seek emergency medical care elsewhere. Most recently, as mentioned above, her VA psychiatrist, Dr. Smith, was inappropriate in questioning her and may have called the police to go to her house.

As a result of the aforementioned, Ms. Treviño's physical medical problems have also been further aggravated and she is in desperate need for emergency comprehensive top quality physical therapy at the Absolute Physical Therapy and Fitness at 2390 Dairy Ashford RD., Houston, Texas, telephone number (281)589-8877.

Robert Rodriguez Treviño

Robert R. Treviño is also 100 percent disabled highly decorated veteran from the Viet Nam war, remains unlawfully incarcerated by the Texas Department of Criminal Justice. I have much previous correspondence to the VA which is either unanswered or improperly answered. I have attached it. Mr. Treviño's medical conditions are detailed in these letters.

To date after two oppressive long years, the although the VA restored Mr. Treviño's Robert's 100% disability rating, it only did so after numerous demands and still the VA and Mr. Walmus have refused to supply a VAMC letter in support of Medical Recommended Intensive Supervision ("MRIS") for Mr. Treviño with the Texas Department of Criminal Justice. This would be presented to the Texas Board of Pardons and Parole, despite Mr. Treviño's dire critical health conditions and for humanitarian grounds. This further deprives him of the rights and benefits that he honorably earned on the battlefield and of his life and freedom.

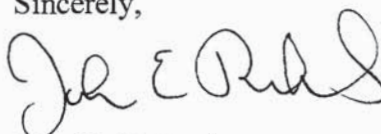
Consequently, Mr. Treviño and Ms. Treviño as his legal representative demand that the DAV, VA, VAMC, provide Mr. Treviño with a letter in support of MRIS. In addition, they

Acting Secretary Sloan D. Gibson
Adam C. Walms
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Page 5

demand that VAMC provide a favorable letter stating it will pay Memorial Hermann Hospital on Southwest Freeway or any other private medical provider to treat Mr. Treviño for all the medical expenses and cost of taking care if Robert's medical upon his release from unlawful imprisonment to ensure Mr. Treviño gets the top quality medical care that he is legally and morally entitled

I look forward to your prompt response to provide me with whatever additional information you require on this request. This is an urgent request. Previous requests have been ignored and this cannot continue.

Sincerely,

A handwritten signature in black ink, appearing to read "John E. Richards".

John E. Richards
Attorney for Gloria Treviño and
Robert Rodriguez Treviño

cc: Gloria Treviño
E. Dufrene via certified mail 7011 2970 0003 8396 5407
Veteran Service Manager
Regional Office of Veterans Affairs
Department of Veteran Affairs
6900 Alameda Rd
Houston, TX 77030

RICHARDS & VALDEZ

ATTORNEYS AND COUNSELORS

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March 15, 2013

VIA HAND DELIVERY

Bryant T. Bayley, MHA, FACHE
Acting Medical Central Director
Department of Veterans Affairs
Michael E. DeBakey V A Medical Center
2002 Holcombe Blvd.
Houston, TX 77030

E. Dufrene
Veteran Service Manager
Regional Office of Veterans Affairs
Department of Veteran Affairs
6900 Almeda Rd
Houston, TX 77030

CONSUMER AFFAIRS, ATTN: Lupe
Michael E. DeBakey V A Medical Center
2002 Holcombe Blvd.
Houston, TX 77030

Re: Robert Rodriguez Treviño
VA number 450-86-7337

Dear Sirs:

I represent Robert R. Treviño.

As you are aware both from my previous correspondence as well as from Mr. Trevino's sister, Gloria Treviño, Robert R. Treviño, who is a decorated veteran from the Viet Nam war, remains unlawfully incarcerated at the TDCJ, Jester VI Psychiatric Unit. My previous correspondence dated January 19, 2013, which is attached, remains unanswered by the VA and all the issues and questions raised in that letter need also to be answered..

Mr. Treviño recently suffered a massive heart-attack and his condition is critical and life-threatening. Robert's medical problems are all service-connected. His disability rating is presently about 200% since his previous 100% disability rating for PTSD and for his other traumatic war injuries were improperly and in violation of regulations, reduced to 80% and have since doubled. In 1995, the Ellis County Judicial Offenders and Dallas, Texas VA improperly denied Robert a competency examination. He was illegally persecuted, railroaded and condemned to life-imprisonment after being falsely accused of being a "pedophile." To date, the VA has improperly refused to restore Robert's previous 100% disability rating even though his service-connected medical condition is critical

EXHIBIT 3

previous 100% disability rating even though his service-connected medical condition is critical and life-threatening or to even provide Mr. Treviño or his sister Gloria, who has his power of attorney with a letter from the VAMC to facilitate the efforts to get Mr. Treviño out on an Emergency Medical Reprieve to present to the Texas Board of Pardons and Parole, despite humanitarian grounds. This further deprives him of the rights and benefits that he honorably earned on the battlefield and of his life and freedom.

Consequently, Mr. Treviño and Ms. Treviño, as his legal representative demand that the DAV, VA, VAMC, reinstate Mr. Treviño to 100% disability rating and to provide a favorable letter addressed to the Memorial City Hospital in Houston which states the VA will pay Memorial City Hospital for all the costs and expenses for the emergency hospitalization and for all other medical treatment of Mr. Treviño upon his release from unlawful imprisonment on Emergency Medical Reprieve to ensure Mr. Treviño 's gets top quality medical care

I look forward to your prompt response to provide me with whatever additional information you require on this request. This is an urgent request. Previous requests have been ignored and this cannot continue. I would request an acknowledgement of receipt of this letter within ten days.

Sincerely,

A handwritten signature in black ink, appearing to read "John E. Richards". The signature is fluid and cursive, with the first name "John" being the most prominent.

John E. Richards

Attorney for Robert R. Treviño

cc: Gloria Treviño
DAV, c/o J Aaron DeLaughter

RICHARDS & VALDEZ

ATTORNEYS AND COUNSELORS

JOHN E. RICHARDS

Board Certified - Labor and Employment Law
Board Certified - Civil Trial Law
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March 15, 2013

VIA HAND DELIVERY

Mr. Adam Walumus,
VAMC Director
Department of Veterans Affairs
Michael E. DeBakey V A Medical Center
2002 Holcombe Blvd.
Houston, TX 77030

E. Dufrene
Veteran Service Manager
Regional Office of Veterans Affairs
Department of Veteran Affairs
6900 Almeda Rd
Houston, TX 77030

Consumer Affairs, c/o Lupe
Michael E. DeBakey V A Medical Center
2002 Holcombe Blvd.
Houston, TX 77030

**Re: Ms. Gloria Treviño
Veteran's Administration Number 466-96-6890**

Dear Sirs:

I represent Gloria Treviño.

Ms. Treviño is a 100% disabled veteran and suffers from chronic PTSD and other serious service-connected medical problems as a result of MST. She has received extensive treatment from the V A Medical Center in Houston for this condition. However, her treatment at the VA has been completely unsatisfactory. The only psychiatrist who has helped her is Doctor Karen S. Brown of Memorial Psychiatry, 820 Gessner Rd, Suite 750, Houston, TX 77024. Ms. Treviño does not have the funds to continue to pay Doctor Brown and is requesting that the VA pay for these sessions. In addition, Dr. Brown has referred Ms. Treviño to Dr. Patricia Salvato to treat her for the diagnosed condition of fibromyalgia. Ms. Treviño also is requesting that the VA pay for her services. Ms. Treviño is also requesting that she be reimbursed for her medical expenses as well as for her future medical care by private medical providers.

In the past, Ms. Treviño has protested her treatment by the VA and has received harassing treatment in return. The psychiatrists, especially furnished by the VA have been completely inadequate. This includes Dr. Smith who was inappropriate when he called her. It is best that the outside vendors now treat Ms. Treviño. Ms. Treviño has also been retaliated against by the DAV, VA, WVA and VAMC and others for her efforts to seek Justice for Robert Trevino and

Family. As a result, she has also been betrayed and is the victim of egregious enterprise of relentless harassment and retaliation. In addition, Ms. Treviño has been slandered, threatened and kicked-out of the Women Veterans of America, (WVA) whose leader serves on the board and "supervises" all of the VA Medical Departments and doctors, including the Mental Health Department and Women's Clinic, and VA Volunteer Office where she was also removed. She made numerous complaints to the VA Director, Adam Walms, VA Police and Consumer Affairs which were in vain. Ms Treviño was further retaliated against and abandoned by Dr. Jenny Hall and the ACT-TEAM, who had been providing her extensive medical care and medication and was dumped her as an outpatient to Dr. Smith. The VA continued to continued to bother Ms. Treviño over her home and cell phones and refused to pay Emergency Room treatments at the West Houston Medical Center to interfere with her ability to seek emergency medical care elsewhere. Most recently, as mentioned above, her VA psychiatrist, Dr. Smith, was inappropriate in questioning her and may have called the police to go to her house. As a result, Ms. Treviño's physical medical problems have also been further aggravated and she is in desperate need for emergency comprehensive top quality physical therapy at the Absolute Physical Therapy and Fitness at 2390 Dairy Ashford RD., Houston, Texas, telephone number, (281)589-8877. She is also in emergency need for additional funds to pay for permanent aid and assistance in caring for herself and for the up-keep of her home.

In addition, Ms. Treviño and has been prescribed Cymbalta, Bupropion, Thamadol, Lyrica, vitamins and supplements for her condition and she requests that the VA pay for these medications rather than furnishing it through the VA pharmacy.

I look forward to your prompt response to provide me with whatever additional information you require on this request. This is an urgent request. Previous requests have been ignored and this cannot continue.

Sincerely,



John E. Richards

cc: Gloria Treviño
J Aaron DeLaughter